

# **EXHIBIT F**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11193-NG

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SHAWN DRUMGOLD,	)
Plaintiff	)
	)
v.	)
	)
TIMOTHY CALLAHAN, et. al.,	)
Defendants	)

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**DEFENDANT, CITY OF BOSTON'S RESPONSE TO PLAINTIFF, SHAWN  
DRUMGOLD'S REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANTS, RICHARD WALSH AND THE CITY OF BOSTON**

NOW COMES THE DEFENDANT, City of Boston, and responds to "Plaintiff,  
Shawn Drumgold's Request for Production of Documents to Defendants, Richard Walsh and  
the City of Boston" as follows:

**REQUEST NO. 1**

All documents which record, reflect or refer to any of the pretext communications  
referenced in Interrogatory No. 1 of the Shawn Drumgold's Interrogatories to Defendant,  
Richard Walsh and Defendant, City of Boston.

**RESPONSE NO. 1**

Objection. The defendant objects to this request on the grounds that it is vague, overly  
broad, unduly burdensome, unlimited in time or scope and not reasonably calculated to  
lead to the discovery of admissible evidence. The defendant further objects on the  
grounds that it is beyond the scope of discovery pursuant to Local Rule 26.1 (C) which  
limits each side to only two (2) separate sets of requests for production, unless the

judicial officer orders otherwise. The defendant has previously responded to two (2) separate sets of requests for production from the plaintiff in the case-at-bar.

### **REQUEST NO. 2**

All documents which record, reflect or refer to any relationship between Madelyn or Rhonda Hamilton and the Boston Police Department or any members of the Boston Police Department, including but no limited to information concerning Madelyn or Rhonda Hamilton providing information to the Boston Police Department at any time, cooperating with the Boston Police Department at any time, acting as informant(s) for any members of the Boston Police Department at any time, having any contact with any member of the Boston Police Department prior to the shooting of Tiffany Moore, or having any contact with any members of the Boston Police Department after the shooting of Tiffany Moore.

### **RESPONSE NO. 2**

Objection. The defendant objects to this request on the grounds that it is vague, overly broad, unduly burdensome, unlimited in time or scope and not reasonably calculated to lead to the discovery of admissible evidence. The defendant further objects on the grounds that it is beyond the scope of discovery pursuant to Local Rule 26.1 (C) which limits each side to only two (2) separate sets of requests for production, unless the judicial officer orders otherwise. The defendant has previously responded to two (2) separate sets of requests for production from the plaintiff in the case-at-bar.

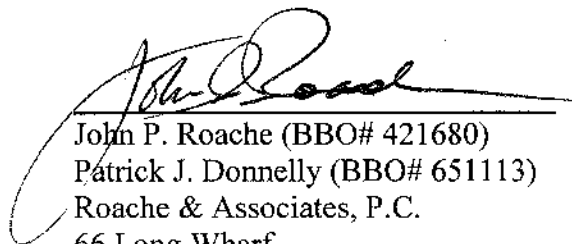
**REQUEST NO. 3**

All documents which record, reflect or refer to any communications between Madelyn Hamilton or Rhonda Hamilton and any members of the Boston Police Department or any investigator, private investigator or person acting on behalf of any Defendant, including but not limited to any such communications with record, reflect or refer to Shawn Drumgold, Rosemary Scapicchio or any members of the Boston Police Department.

**RESPONSE NO. 3**

Objection. The defendant objects to this request on the grounds that it is vague, overly broad, unduly burdensome, unlimited in time or scope and not reasonably calculated to lead to the discovery of admissible evidence and that said request seeks materials that are subject to the attorney-client privilege and work product doctrine. The defendant further objects on the grounds that it is beyond the scope of discovery pursuant to Local Rule 26.1 (C) which limits each side to only two (2) separate sets of requests for production, unless the judicial officer orders otherwise. The defendant has previously responded to two (2) separate sets of requests for production from the plaintiff in the case-at-bar.

Respectfully submitted,  
By Defendant City of Boston  
Through its attorneys,

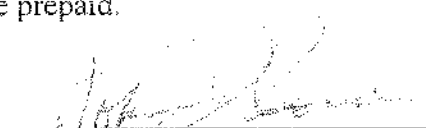


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Date: May 29, 2007

**CERTIFICATE OF SERVICE**

I, John P. Roache, hereby certify that on this 29 day of May, 2007, I served a copy of the foregoing DEFENDANT, CITY OF BOSTON'S RESPONSE TO PLAINTIFF, SHAWN DRUMGOLD'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS, RICHARD WALSH AND THE CITY OF BOSTON, to all counsel via first class mail, postage prepaid.

  
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John P. Roache (BBO# 421680)